

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW HAMPSHIRE

**Laurie Ortolano,**

Plaintiff

**V.**

**The City of Nashua, New Hampshire; et al. )**

## Defendants

**Civil Action No. 1:22-CV-00326**

**PLAINTIFF'S REPLICATION TO DEFENDANT CITY OF NASHUA'S  
OBJECTION TO PLAINTIFF'S MOTION TO COMPEL PURSUANT TO L.R.  
7.1(e)(1)**

NOW COMES the Plaintiff, Laurie Ortolano, and in response to Defendant's Objection to her Motion to Compel says as follows:

1. Plaintiff's efforts to obtain the audio/visual recordings is not a "backdoor" effort to obtain the 91-A records she sought in state court.
2. The Plaintiff's 91-A request sought the transcripts of the Lombardi investigation and the footage. The Plaintiff has all the transcripts and 5 of the 11 audio/visual recordings produced by the Defendant.
3. Therefore, her Motion to Compel the production of the remaining 6 audio/visual recordings is not a back door attempt to obtain the 91-A material, but rather the remaining 6 audio/visual tapes sought in discovery.
4. The Motion to Compel seeks the production of the audio/visuals that were not produced but reserved for further discussion between Plaintiff's prior counsel and Defendant's counsel.
5. A legal memorandum is not necessary since the replication addresses a disputed factual assertion in Defendant's Objection.

**Wherefore,** Mrs. Ortolano respectfully requests that the Court compel the production of the 6 remaining audio/visual recordings that were requested in discovery.

Respectfully submitted,  
Plaintiff, Laurie Ortolano,  
By and through Counsel,

November 6, 2024

/s/ William Aivalikles  
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### **CERTIFICATE OF SERVICE**

I certify that on this 6<sup>th</sup> day of November 2024 I served a copy of this Motion to Compel on all parties of record using the ECF electronic filing system.

/s/ William Aivalikles  
William Aivalikles